

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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Complaint on Sunday
and Holiday Collections

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. C2001-1

DAVID B. POPKIN MOTION TO COMPEL RESPONSES TO INTERROGATORIES TO
THE UNITED STATES POSTAL SERVICE [DBP/USPS-18-19] AND POTENTIAL
MOTION FOR LATE ACCEPTANCE

August 1, 2001

I move to compel responses to interrogatories submitted to the United States Postal Service that were objected to by them on July 27, 2001. This motion is being mailed on August 1, 2001, and should arrive at the Commission on August 3, 2001, under current USPS standards. In the event that they do not arrive by the deadline, I move for late acceptance.

Respectfully submitted,



August 1, 2001

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

1. DBP/USPS-18 The objective of this interrogatory was to determine the extent to which retail window service was actually reduced or eliminated on days shortly before or after a holiday. Based on the response to DBP/USPS-8, there is no national policy to eliminate or reduce service and yet based on information which is already in the record, service does get reduced or eliminated. That local action is part of the real problem being litigated in this Docket. The level of service that exists on and around holidays varies from area to area and from year to year with apparently no rhyme or reason other than apparently to save work hours without full regard to the level of service and needs of the mailing public. Utah and Southeast New England are the only two districts that are mentioned in existing information. The extent of the reduction or elimination is needed to fully evaluate the condition.

2. DBP/USPS-19 The Postal Service has indicated that there is no national policy for the elimination or reduction of retail window service. Based on the limited data that is available, this elimination or reduction is taking place and the interrogatory attempts to find out the authority, if any, by which that occurs.

3. For the reasons stated, I move to compel responses to the referenced interrogatories.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

August 1, 2001


David B. Popkin